



# South Coast Air Quality Management District

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FAXED: MAY 31, 2005

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Ms. Carol Armstrong, Environmental Specialist  
City of Los Angeles, Bureau of Engineering  
650 South Spring Street, Room 574  
Los Angeles, CA 90014

## **Draft Mitigated Declaration for the Proposed North Outfall Replacement Sewer Air Treatment Facility Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time granted by the lead agency to review the Draft EIR for the proposed project and provide comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND).

The SCAQMD staff has reviewed the Draft Mitigated Negative Declaration (MND) for the proposed project and is concerned about the adequacy of the air quality analysis. The air quality analysis lacks any quantification of potential emissions from construction and operation of the proposed facility. In addition, the health risk assessment, although prepared, was not included in the Draft MND.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC050414-03  
Control Number

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**Construction and Operational Air Quality Impacts**

1. In Section 3 (a-d) Air Quality on page 27 of the Initial Study portion of the Draft Mitigated Negative Declaration (Draft MND), the lead agency has determined that air quality impacts would be less than significant with mitigation incorporated. Review of the environmental checklist indicates that the lead agency has not quantified the construction or operational impacts. The lead agency's main explanation in its checklist responses is "Refer to text," however, the air quality impacts are not quantified in the text. The following are specific comments on the construction and operational phases in the environmental checklist provided to the SCAQMD:

**Construction air quality impacts**

Although the lead agency refers to construction activities associated with building the ATF on page 8 of the text, construction air quality impact estimates are not included in the Draft MND. The lead agency should quantify construction air quality impacts using the methodologies in the South Coast Air Quality Management District's CEQA Handbook (Handbook) or other approved air quality analysis methodologies. It is also possible the lead agency could use the URBEMIS 2002 model to calculate construction impacts, although the ATF is not a land use identified in the model. In this situation, the lead agency would need to identify a similar land use to the ATF to use as a surrogate for the proposed project.

**Operational air quality impacts**

The lead agency refers on page 12 to operational emissions that must comply with applicable SCAQMD rules and regulations. The lead agency should also quantify operation air quality impacts (see comment above under construction air quality impacts). The operational impacts information is especially important for the SCAQMD, as a responsible agency, because SCAQMD permit engineers rely on the CEQA document when processing subsequent permit applications submitted by the project proponent. Therefore, the Final MND should include the operational emission estimates, emission factors, methodologies and control efficiencies for the proposed mitigation measures. Permitting questions can be addressed for this type of project by contacting SCAQMD Engineering and Compliance staff at (909) 396-2684. Construction and operational information could be included in the Final MND in a table, as part of the narration or as an appendix.

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In addition to identifying feasible mitigation measures on pages 2-3 in the Mitigation Monitoring Plan in the Draft MND, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

**Health Risk Assessment**

2. In Section F. Hazards and Hazardous Materials on page 19, the lead agency states that a health risk assessment (HRA) has been completed and will be submitted with the permit application. The HRA was not included in the Draft MND for public review and no further reference to the HRA, however, is made in the environmental checklist. A preliminary HRA was sent to SCAQMD staff upon request. The HRA should have been included in the Draft MND (as an appendix for example) to support the lead agency's finding of less than significant impacts in Section F. Hazards and Hazardous Materials on page 19 of the Draft MND. The following are specific comments as to the HRA analysis provided to the SCAQMD:
  - a) The HRA states that the processing of calm wind speeds was bypassed for the toxics modeling, but not for the odor modeling. The calm wind speeds bypass option is related to the processing of the meteorological data. Since both the toxic and odor modeling were completed with SCAQMD meteorological data sets, the calm wind speed processing should be bypassed for both the toxic and the odor modeling.
  - b) The HRA states that each facility was modeled as a single stack, but does not present how the sources were merged into the representative stacks. Since the information was not available, the SCAQMD could not verify the stack information. The Final MND should clearly show how the representative stacks were developed from the individual sources at each facility. The development of mass rates from concentrations, effective diameter, effective stack height, and effective flow rates should be detailed.
  - c) The HRA states that the U.S. Environmental Protection Agency recommended the use of the urban dispersion coefficient. For future reference, the SCAQMD suggests that all areas under its jurisdiction should be modeled with the urban dispersion coefficient.

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- d) It appears from the spreadsheet tables in Appendix C of the HRA that the average annual emission rates were used to estimate carcinogenic and chronic noncarcinogenic risk. The SCAQMD suggests that the lead agency use maximum annual emission rates to estimate carcinogenic and chronic noncarcinogenic risk for the Final MND.